

EXHIBIT B-2
NAACP & MALC
CLERICAL

EXHIBIT B**CLERICAL****DECHERT**

Timekeeper	Workdate	Bill Hours	Narr	CODE
Yeary, Michelle K.	8/4/2014	2.00	Deposition summaries, coordinating deposition designations.	C,E
TOTAL		<u>2</u>		

EXHIBIT B**CLERICAL****DECHERT**

Timekeeper	Workdate	Bill Hours	Narr	
Rudd, Amy L.	5/9/2014	0.50	Correspond with team regarding search for affected persons; correspond with clients regarding dates for 30(b)(6) depositions.	C
TOTAL		0.5		

EXHIBIT B**CLERICAL****DECHERT**

Timekeeper	Workdate	Bill Hours	Narr	
Rosenberg, Ezra D.	9/17/2013	2.50	Attention to filing of complaint; multi-calls with DOJ, plaintiff group, Texas DAG, L Stelcen.	C
Rosenberg, Ezra D.	9/24/2013	1.00	Call with A Derfner at length re scheduling; emails and calls with M Posner re experts and re scheduling.	C
Rosenberg, Ezra D.	4/11/2014	3.50	Prepare Advisory to Court re protocol; multi calls with M Posner and E Westfall and G Hebert re scheduling issues; review deposition schedule.	E,C
TOTAL		<u>7</u>		

CLERICAL
DECHERT

Timekeeper	Workdate	Bill Hours	Narr	
Cohan	9/18/2013	4.50	Revise motion to consolidate per edits received from team; file pro hac motions on behalf of Lawyers' Committee; file motion to consolidate and proposed consent order.	N, B, C
Cohan	9/23/2013	1.00	Check docket and distribute most recent filings and orders; coordinate filing of attorney registration forms	C,N
Cohan	9/24/2013	1.00	Submit all attorney registration forms to S.D. Tex. clerk's office for processing (.5); additional general case administration (.5)	C,N
Cohan	9/25/2013	0.50	Research response due date and form for recently filed motion to intervene.	C
Cohan	9/26/2013	0.60	File and serve return of service.	C
Cohan	10/7/2013	0.30	Coordinate with Attorney General office for return of discs containing databases.	C
Cohan	10/9/2013	0.50	Coordinate return of discs containing state databases.	C
Cohan	11/21/2013	5.10	Review, file, and serve initial disclosures; review and revise response to motion to dismiss.	C
Cohan	11/22/2013	3.60	Finalize draft and file response to motion to dismiss.	C
Cohan	11/26/2013	0.50	Prepare and file pro hac vice motion for Michelle Yeary.	N,C
Cohan	12/3/2013	0.50	File attorney ECF registration forms.	N,C
Cohan	2/24/2014	8.20	Incorporate additional edits received from other intervenors; proof, cite check, and finalize supplemental brief on legislative privilege; file supplemental brief on legislative privilege	C, B
Cohan	4/7/2014	2.00	Assist various intervenor groups with logistics relating to depositions and drafting and serving objections to requests for production.	C,B

CLERICAL
DECHERT

Cohan	4/15/2014	2.00	Create master calendar.	C
Cohan	4/16/2014	2.50	Update master calendar; coordinate logistics for depositions to be held at Dechert Austin office.	C
Cohan	4/22/2014	2.50	Coordinate logistics for upcoming Ingram deposition; update master calendar.	C
Cohan	4/28/2014	1.50	Coordinate scheduling of depositions and other case admin tasks.	C
Cohan	4/29/2014	4.50	Revise and file brief in opposition to motion to quash third party subpoenas.	C
Cohan	5/2/2014	2.50	Coordinate and update master calendar and additional admin tasks.	C
Cohan	5/7/2014	8.20	Assist in preparation for Rodriguez deposition; compile documents for discovery responses; prepare deposition notices and subpoenas for Beuck, Harless, and Riddle depositions; review documents for privilege prior to production.	C,B
Cohan	5/13/2014	1.50	Finalize filing of response for judicial notice of Inspector General report; contact potentially affected individuals.	C,B
Cohan	5/14/2014	2.00	Update master calendar; contact Plaintiff groups for information regarding affected persons; coordinate deposition scheduling with plaintiff groups and State.	C
Cohan	5/19/2014	1.50	Prepare revised Beuck subpoena; confirm deposition dates with State; attend emergency phone hearing with Court; coordinate logistics for Cesinger deposition.	C,B
Cohan	5/21/2014	3.50	Compile all information available to date on identified affected individuals; schedule additional depositions; update master calendar.	C

EXHIBIT B
CLERICAL
DECHERT

Cohan	5/22/2014	2.00	Update information regarding affected individuals.	C
Cohan	5/29/2014	2.50	Coordinate deposition prep for Y.Banks and L.Lydia; review documents in preparation for Banks and Lydia depositions	C
Cohan	6/2/2014	8.50	Prepare objections to NAACP 30(b)(6) deposition notice; prepare for and prep witnesses in advance of NAACP 30(b)(6) deposition; coordinate deposition scheduling; attend call regarding affected persons.	B,C
Cohan	6/3/2014	5.00	Revise and coordinate verification of Texas NAACP and MALC interrogatory responses; prepare for Y.Banks deposition; coordinate scheduling of depositions and update master calendar; draft motion for judicial notice; draft and file motions to transfer and expedite	C,B
Cohan	6/10/2014	7.50	Prepare deposition outlines for Riddle and Beuck depositions; coordinate deposition scheduling; attend call to discuss deposition scheduling	C,B
Cohan	6/11/2014	7.00	Update information regarding affecter persons; coordinate deposition scheduling; draft Harless and Riddle deposition outlines; compile documents for use in Harless and Riddle depositions.	C,B
Cohan	6/12/2014	3.00	Finalize deposition outlines; coordinate meetings with affected persons; revise MALC 30(b)(6) deposition objections; coordinate with DOJ on deposition scheduling.	C,B

CLERICAL
DECHERT

Cohan	6/13/2014	7.80	Revise deposition outlines for Harless and Riddle; review Beuck deposition outline; review documents in preparation for Riddle, Beuck, and Harless depositions; issue amended deposition notices and update master calendar; review deposition summaries compiled by paralegals; coordinate meetings with potentially affected	C,B
Cohan	6/16/2014	7.70	Meet with Virginia Jackson regarding identification as potentially affected person; call with Brennan Center to discuss meetings with potentially affected persons; draft and serve notices of amended deposition; draft and file response in opposition to motion to compel federal databases; revise Harless deposition outline; attend call to discuss Beuck deposition; revise objections to MALC 30(b)(6)	B,C,N
Cohan	6/19/2014	6.00	Preparation for C.Beuck deposition; meet with S.Bates (affected person) to discuss litigation and experience with SB 14; prepare filing for pro hac motions; update and circulate chart summarizing affected persons findings.	N,C
Cohan	6/23/2014	6.50	Update and circulate chart summarizing facts of affected persons; correspond with State re MALC 30(b)(6) deposition; prepare M.Golando for MALC 30(b)(6) deposition; draft and issue subpoenas and notices of deposition; coordinate logistics for proposed Friday (6/27) depositions; update and circulate master	C,B

CLERICAL
DECHERT

Cohan	6/24/2014	5.00	Prepare supplemental disclosures; update master calendar; coordinate background checks for affected persons	C,B
Cohan	6/26/2014	4.00	Revise and serve MALC and Texas NAACP responses to Requests for Admission; compile list of all depositions to be scheduled in July; coordinate and review criminal background searches of affected persons; update master calendar.	C,B
Cohan	6/30/2014	1.50	Compile list of all depositions to be scheduled in July and August; update master calendar; coordinate deposition scheduling.	C
Cohan	7/7/2014	0.50	Update master calendar.	C
Cohan	7/9/2014	1.50	Update master calendar and coordinate various logistics for upcoming depositions.	C
Cohan	7/10/2014	2.00	Prepare and file request for judicial notice of certain census data; update master calendar.	C
Cohan	7/14/2014	0.80	Update master calendar and coordinate deposition logistics.	C
Cohan	7/16/2014	2.50	Attend call to discuss affected person depositions; update master calendar; meet with N. Korgaonkar to discuss recent affected person depositions	B,C
Cohan	7/17/2014	0.20	Finalize and file unopposed motion to amend scheduling order.	C
Cohan	7/18/2014	2.50	Update master calendar and coordinate deposition logistics; review depositions and begin summaries for findings of fact and deposition designations.	C,B
Cohan	7/21/2014	1.50	Prepare, file, and serve corrected expert report; update master calendar; coordinate affected person depositions	C,B

EXHIBIT B
CLERICAL
DECHERT

Cohan	8/18/2014	5.00	Prepare deposition designations; update master calendar; review reply expert reports.	C,B
Cohan	8/19/2014	3.00	Prepare, file, and serve supplemental production; coordinate deposition logistics; review reply expert reports.	C,B
Cohan	8/20/2014	2.50	Draft and serve duces tecum notice; review documents in preparation for Hood and Milyo depositions.	C,B
Cohan	8/31/2014	1.50	Prepare deposition designation materials for trial.	C,V
Cohan	10/13/2014	2.00	Prepare appendix, cover pages, and coordinate other logistics for upcoming filing of emergency application to vacate stay pending Fifth Circuit decision.	C,B
Cohan	10/18/2014	2.50	Review Supreme Court ruling; compile list of all contacts for public records requests to Brennan Center.	C,B
Cohan	11/3/2014	0.50	Coordinate withdrawal/reappearance of E.Rosenberg in SD Texas.	N,C
Cohan	12/16/2014	0.50	Prepare 5th Circuit admission application for E.Rosenberg.	N,C
Cohan	1/22/2015	1.50	Begin compiling chart summarizing efforts of all affected persons to obtain voter ID.	C
Cohan	6/8/2015	0.50	Draft motion to withdraw Mark Posner as counsel.	C,N
Cohan	7/2/2015	0.60	Finalize and file Rule 28j letter.	C
Cohan	7/31/2015	0.50	Coordinate with Lawyers' Committee regarding affected persons who testified at trial for purposes of obtaining additional interviews.	C
Cohan	8/25/2015	0.50	Coordinate logistics for meet and confer between all parties to be held at Dechert's office on 8/27/15.	C

EXHIBIT B
CLERICAL
DECHERT

Cohan	9/10/2015	1.50	Prepare filing on behalf of Texas NAACP, MALC, and LDF adopting response to motion for en banc review	C
Cohan	4/4/2016	4.50	Compile all record evidence to be used in supplemental brief for 5th Circuit en banc rehearing.	C
Cohan	4/5/2016	3.70	Compile record evidence for use in 5th Circuit supplemental en banc briefing; call with B. Herrmann to discuss research assignments for Texas voter ID brief	C
Cohan	5/9/2016	6.00	Revise, finalize, and file en banc brief.	C
Cohan	8/9/2016	3.50	Provide summary of 5th Circuit en banc opinion for use in review and analysis of intent issues; draft and file notice of exhibits for use at 8/10/16 hearing; prepare and file pro hac for N.Steiner.	N,C

TOTAL **186.3**

EXHIBIT B
CLERICAL
DECHERT

Timekeeper	Workdate	Bill Hours	Narr	Code
Capobianco	10/4/2013	1.50	Review and retrieve filed documents and upload to iManage at the request of LStelcen.	C
Capobianco	11/1/2013	2.50	Prepare co-counsel list at the request of ERosenberg.	C
Capobianco	11/6/2013	4.60	Review documents and retrieve cases at the request of ERosenberg.	B,C
Capobianco	11/7/2013	3.00	Organize in chronological order authorities at the request of ERosenberg.	C
Capobianco	11/25/2013	1.00	Retrieve and save newly filed documents.	C
Capobianco	11/26/2013	0.50	Retrieve and save newly filed documents.	C
Capobianco	1/14/2014	2.80	Retrieve documents and provide to Crivella West at the request of MYearv.	C
Capobianco	2/4/2014	3.80	Retrieve documents at the request of ERosenberg.	C
Capobianco	2/6/2014	3.00	Review and organize incoming documents and provide CrivellaWest with document production.	C
Capobianco	2/10/2014	0.40	Provide vendor with opposing counsel document production.	C
Capobianco	2/14/2014	1.00	Review and organize incoming e-mails and documents.	C
Capobianco	2/17/2014	0.50	Retrieve privilege logs and provide to MYearv; organize incoming filings.	C
Capobianco	2/18/2014	3.00	Provide MYearv with a count of documents listed on defendant privilege log.	C
Capobianco	2/19/2014	2.70	Review DOJ document production and prepare index regarding Texas DPS locations at the request of MYearv.	B,C
Capobianco	2/21/2014	2.80	Review DOJ document production and prepare index regarding Texas DPS locations at the request of MYearv.	B,C
Capobianco	2/24/2014	4.90	Review draft brief and retrieve exhibits; draft signature block.	B,C
Capobianco	2/25/2014	1.90	Retrieve new filings and upload to iManage; retrieve authorities and provide to ERosenberg.	B,C
Capobianco	2/27/2014	1.00	Retrieve briefing and provide to ERosenberg.	C
Capobianco	3/4/2014	0.30	Retrieve newly filed documents and save on iManage.	C
Capobianco	3/11/2014	1.50	Provide vendor with new document produced by co-counsel.	C

EXHIBIT B
CLERICAL
DECHERT

Capobianco	3/12/2014	0.50	Confirm and update distribution list at the request of MYeary.	C
Capobianco	4/1/2014	1.00	Retrieve and organize newly filed documents and save on iManage.	C
Capobianco	4/2/2014	0.60	Retrieve discovery responses at the request of MYeary.	C
Capobianco	4/3/2014	1.20	Retrieve and upload hearing transcripts.	C
Capobianco	4/4/2014	0.50	Retrieve and save newly filed documents.	C
Capobianco	4/7/2014	1.00	Retrieve exhibits and provide to co-counsel.	C
Capobianco	4/8/2014	1.00	Retrieve and save incoming filings.	C
Capobianco	4/11/2014	2.00	Convert documents into word at the request of MYeary in preparation for discovery responses.	C
Capobianco	4/15/2014	1.50	Retrieve new filings and upload to iManage. Conference with Crivella West regarding document productions.	C
Capobianco	4/16/2014	1.00	Retrieve new filings and upload to iManage. Review incoming document production.	B,C
Capobianco	4/17/2014	2.90	Retrieve document production at the request of MYeary.	C
Capobianco	4/23/2014	0.50	Retrieve documents provided by co-counsel at the request of MYeary.	C
Capobianco	4/24/2014	1.00	Retrieve co-counsel documents at the request of MYeary.	C
Capobianco	4/28/2014	2.50	Retrieve documents and print at the request of ERosenberg.	C
Capobianco	4/29/2014	1.50	Retrieve new filings and upload to iManage; communication with vendor regarding document productions.	C
Capobianco	4/30/2014	5.00	Retrieve documents and save on iManage. Draft document at the request of MYeary.	B,C
Capobianco	5/1/2014	2.50	Continue to organize documents received.	C
Capobianco	5/5/2014	4.00	Retrieve and organize document productions; work with litigation support regarding CaseLogistix setup.	C
Capobianco	5/6/2014	6.00	Review and redact documents; retrieve and organize documents to be produced.	C
Capobianco	5/7/2014	4.50	Document production.	C
Capobianco	5/8/2014	6.00	Document production.	C
Capobianco	5/12/2014	3.80	Retrieve incoming documents and save on iManage; document production; Review interrogatories responses at the request of ERosenberg regarding voter fraud	B,C

EXHIBIT B2
CLERICAL
DECHERT

Capobianco	5/13/2014	3.40	Review and organize incoming documents; document production.	B,C
Capobianco	5/14/2014	1.00	Document production.	C
Capobianco	5/15/2014	0.60	Review and organize incoming documents.	B,C
Capobianco	5/16/2014	0.50	Review and organize incoming documents.	B,C
Capobianco	5/19/2014	1.00	Review and organize incoming documents.	B,C
Capobianco	5/20/2014	3.00	Review and organize incoming documents. Retrieve deposition transcripts and exhibits from Section 5 case and provide to MYeary. Upload new document production received from co-counsel.	C
Capobianco	5/22/2014	1.00	Review draft discovery responses and add signature block.	B,C
Capobianco	5/23/2014	3.90	Prepare privilege log; print privileged documents.	B,C
Capobianco	5/28/2014	3.50	Review and organize incoming documents; review privilege logs at the request of MYeary.	B,C
Capobianco	5/29/2014	1.50	Review and organize incoming documents; prepare list regarding subpoenas at the request of MYeary.	B,C
Capobianco	5/30/2014	2.50	Review and organize incoming documents.	B,C
Capobianco	6/2/2014	2.20	Review and organize incoming documents; review document production of documents dated prior to 2011 at the request of MYeary.	B,C
Capobianco	6/3/2014	1.00	Review and organize documents.	B,C
Capobianco	6/4/2014	2.50	Review and organize incoming documents; draft opposition to motion to quash at the request of MYeary.	B,C
Capobianco	6/5/2014	2.00	Retrieve documents at the request of MYeary.	C
Capobianco	6/16/2014	3.80	Review and organize incoming documents.	B,C
Capobianco	6/17/2014	1.30	Review and organize incoming documents.	B,C
Capobianco	6/18/2014	1.20	Review and organize incoming documents.	B,C
Capobianco	6/20/2014	3.50	Review and organize incoming documents. Download document produced by co-plaintiffs at the request of MYeary.	B,C
Capobianco	6/23/2014	1.20	Review and organize incoming documents.	B,C

EXHIBIT B
CLERICAL
DECHERT

Capobianco	6/24/2014	1.50	Retrieve and organize incoming documents; review incoming document productions from defendants and contact Crivella West.	B,C
Capobianco	6/25/2014	0.60	Review and organize incoming documents.	B,C
Capobianco	6/27/2014	9.30	Review and organize incoming documents; provide newly received documents productions to Crivella West; assist MYeary with expert report filings.	B,C
Capobianco	6/30/2014	2.50	Review and organize incoming documents; print expert reports at the request of ERosenberg.	B,C
Capobianco	7/1/2014	1.50	Review and organize incoming documents; organize co-plaintiffs document production and provide to Crivella West.	B,C
Capobianco	7/2/2014	0.50	Review and organize incoming documents.	B,C
Capobianco	7/3/2014	1.20	Review and organize incoming documents; organize co-plaintiffs document production and provide to Crivella West.	B,C
Capobianco	7/7/2014	0.30	Review and organize incoming documents.	B,C
Capobianco	7/8/2014	1.50	Review and organize incoming documents. Perform research at the request of MYeary.	B,C
Capobianco	7/9/2014	1.00	Review and organize incoming documents.	B,C
Capobianco	7/10/2014	3.50	Review and organize incoming documents. Perform document review and prepare for production.	B,C
Capobianco	7/14/2014	2.00	Review and organize incoming documents. Prepare document production.	B,C
Capobianco	7/15/2014	2.50	Review and organize incoming documents. Draft privilege log as to TMFischer production.	B,C
Capobianco	7/16/2014	2.00	Review and organize incoming documents. Draft 2nd amended scheduling order.	B,C
Capobianco	7/17/2014	0.70	Review and organize incoming documents.	B,C
Capobianco	7/18/2014	3.00	Review and organize incoming documents.	B,C
Capobianco	7/21/2014	0.50	Review and organize incoming documents.	B,C
Capobianco	7/23/2014	1.20	Review and organize incoming documents.	B,C
Capobianco	7/24/2014	1.00	Review and organize incoming documents.	B,C

EXHIBIT B
CLERICAL
DECHERT

Capobianco	7/28/2014	2.00	Review and organize incoming documents.	B,C
Capobianco	7/29/2014	1.00	Review and organize incoming documents.	B,C
Capobianco	7/30/2014	2.50	Review and organize incoming documents; review incoming productions and confirm with Crivella West the status of documents available on portal.	B,C
Capobianco	7/31/2014	1.00	Review and organize incoming documents. Upload new document production.	B,C
Capobianco	8/1/2014	0.50	Review and organize incoming documents.	B,C
Capobianco	8/4/2014	1.50	Review and organize incoming documents; prepare list at the request of MYearv.	B,C
Capobianco	8/5/2014	0.70	Review and organize incoming documents.	B,C
Capobianco	8/7/2014	1.70	Review and organize incoming documents; retrieve cases at the request of ERosenberg.	B,C
Capobianco	8/8/2014	6.50	Assist co-plaintiffs with trial exhibits; retrieve cases for ERosenberg.	C
Capobianco	8/14/2014	12.00	Trial preparation.	V,C
Capobianco	8/15/2014	8.00	Trial preparation.	V,C
Capobianco	8/16/2014	1.00	Trial preparation.	V,C
Capobianco	8/17/2014	2.00	Trial preparation.	V,C
Capobianco	8/18/2014	10.50	Trial preparation.	V,C
Capobianco	8/19/2014	11.00	Trial preparation.	V,C
Capobianco	8/20/2014	10.50	Trial preparation.	V,C
Capobianco	8/21/2014	11.00	Trial preparation.	V,C
Capobianco	8/22/2014	17.50	Trial preparation.	V,C
Capobianco	8/25/2014	7.50	Trial preparation.	V,C
Capobianco	8/26/2014	6.90	Trial preparation.	V,C
Capobianco	8/27/2014	7.50	Trial preparation.	V,C
Capobianco	8/28/2014	10.00	Trial preparation.	V,C
Capobianco	8/29/2014	10.00	Trial preparation.	V,C
Capobianco	8/30/2014	6.00	Trial preparation.	V,C
Capobianco	8/31/2014	1.00	Trial preparation.	V,C
Capobianco	9/1/2014	3.00	Trial preparation.	V,C
Capobianco	9/20/2014	3.00	Post trial work.	V,C
Capobianco	9/21/2014	3.00	Post-trial work.	V,C
Capobianco	9/22/2014	2.00	Post-trial work.	V,C
Capobianco	9/29/2014	1.00	Retrieve and save newly filed documents.	C
Capobianco	10/2/2014	1.50	Organize file.	C
Capobianco	10/10/2014	1.50	Review and organize incoming documents; draft motion for leave at the request of MYearv.	B,C
Capobianco	10/13/2014	1.50	Review and organize incoming filings.	B,C
Capobianco	10/21/2014	1.00	Retrieve newly filed documents and save on iManage.	C

EXHIBIT
CLERICAL

DECHERT

Capobianco	10/28/2014	1.00	Retrieve newly filed documents and upload on iManage.	C
Capobianco	11/7/2014	2.00	Prepare exhibits for filing on ECF.	C
Capobianco	11/10/2014	6.50	Prepare trial exhibits for filing on ECF.	C
Capobianco	11/11/2014	3.80	Filed trial exhibits on Pacer.	C
Capobianco	11/18/2014	2.50	Retrieve newly filed documents and upload to iManage.	C
Capobianco	11/19/2014	2.00	Retrieve newly filed documents and upload to iManage.	C
Capobianco	11/20/2014	2.60	Review incoming filings by defendants and prepare list of missing exhibits at the request of MYearv.	C
Capobianco	11/21/2014	1.20	Review incoming filing regarding trial exhibits filed by defendant and compare to list at the request of MYearv/	C
Capobianco	11/24/2014	1.90	Review chart provided by defendants regarding gaps in exhibits numbers not posted on Pacer.	C
Capobianco	3/17/2016	1.30	Assemble e-mail distribution list.	C
TOTAL		<u>362.2</u>		

EXHIBIT B-2
CLERICAL
MALC-GARZA

Jose Garza			
DATE	ACTIVITY	TIME	CODE
10-14-13	Review and organize file, begin review of House Journal. (3.5); track down amendments. (1)	4.5	C
12-15-13	Call and help set up interviews with Chair, Anchia, Figueroa.	0.3	C
1-(13-17)-14	Continue efforts to set up interviews of potential witnesses, MALC related witnesses.	0.4	C
1-19-17	review cases listed for conference for today. Confer with co- Council. Work on file organization (CaseManagement).	0.6	C

TOTAL 5.8

EXHIBIT B-2
CLERICAL
LAWYER'S COMMITTEE

Rosenberg Lawyer's Committee

11/17/2014	Confer with M Posner re briefing issues .3 hours Emails to and from M VandDalen re briefing issues .1 hours Voice mails to and from RYagood re briefing issues .2 hour Review multi emails re exhibit filings .3 hours	0.9	C
12/17/2014	Confer with clerk re electronic appellate record .2 hours	0.2	C
12/18/2014	Emails to and from clerk re appellate record .1 hour Emails to and from Erin Flynn (DOJ) re appellate record and confer with M Posner re thereto .2 hours Confer with M Posner re Section 2 issues .5 hours	0.8	C
4/10/2015	Attending to filing of acknowledgement of argument and emails and confer with M Posner re thereto	0.5	C
TOTAL		2.4	